

# Federal Defenders OF NEW YORK, INC.

Southern District  
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January 16, 2020

**By ECF**

Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

JAN 17 2020

**Re: United States v. Tanisha Gregory**  
**18 CR 542 (AJN)**

Dear Judge Nathan,

I write, on behalf of Tanisha Gregory, who is represented by Assistant Federal Defender, Akin Adepaju, in the District of Columbia. Ms. Gregory asks the Court to terminate her term of probation pursuant to 18 U.S.C. § 3564(c), which permits the Court to "terminate a term of probation previously ordered and discharge the defendant at any time after the expiration of one year of probation." The 3-year term of probation imposed here began on May 29, 2018. Ms. Gregory has completed more than half of her supervisory term, specifically 19 months. She is employed, raising her two minor children, and has been entirely compliant with her probation conditions, including making monthly restitution payments, which will continue even after the term of probation expires. The supervising probation officer consents to the termination and the prosecutor has no objection to this motion for early termination of Ms. Gregory's probation.

The offense occurred in 2015. The sentence was imposed by the United States District Court for the District of Delaware on May 29, 2018. Ms. Gregory lives here in New York City and was supervised by Pretrial Services in the Southern District while she was on pretrial release and even after she pleaded guilty to one count of false claims conspiracy. The Delaware court imposed a three-year probationary sentence, then transferred supervision and jurisdiction to this Court. See Docket No. 1 (Order transferring jurisdiction to the Southern District of New York).

Ms. Gregory has complied entirely with all conditions of pretrial release. The same trend has continued while on

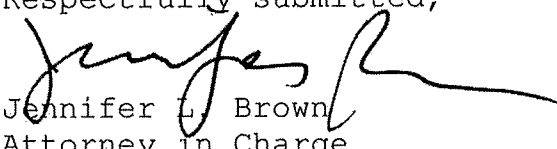
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probation. Notably, she has no condition requiring any sort of programming or counseling, and none has been needed during the several years of supervision. Her older child is doing well in high school and Ms. Gregory hopes to start visiting colleges with him. Terminating the probation would also allow her to move freely to go on college visits with her son. Her other child is in elementary school. The conviction here was her first arrest, offense, and conviction.

The underlying offense involved no violence nor was a weapon used. Ms. Gregory herself had no criminal history and no history of violence, drug or alcohol abuse, psychiatric, psychological, or other mental health issues. By email, Probation Officer Zondra Jackson wrote, "I consent to [Ms. Gregory's] request for early termination. [Gregory] is a first-offender who is compliant with her supervision conditions. The nature and circumstances of the offense was not a crime of violence or warranted a role enhancement. [She] has stable housing and employment. She has completed 19 months of her 36 months' probation sentence. Since it is unlikely that [she] will satisfy her restitution obligation on her maximum expiration date, and the fact that she has agreed to remit restitution after her supervision case closes, she is a good candidate for early termination." Similarly, via email, Edmond Falgowski, Assistant United States Attorney in the District of Delaware, indicated he has "no objection" to Ms. Gregory's request for early termination.

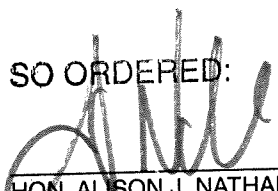
For all the above-stated reasons, and with the consent of probation and without objection from the Government, I ask that Ms. Gregory's term of probation be terminated. **SO ORDERED**

Respectfully submitted,

  
Jennifer L. Brown  
Attorney in Charge  
Federal Defenders of New York  
(212) 417-8722

cc: AUSA Edmond Falgowski, via email  
USPO Zondra Jackson, via email  
AFPD Akin Adepoju, via email

**SO ORDERED:**

  
HON. ALISON J. NATHAN  
UNITED STATES DISTRICT JUDGE

1/16/20